



Paducah Citizens Advisory Board

"working for the future"

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Recommendation 13-02: Reallocation of C-400 Phase IIb Resources

May 16, 2013

Background

The Paducah Citizens Advisory Board (CAB) recognizes and agrees with DOE that the remediation of groundwater contamination at the PGDP site should be assigned the highest priority for allocation of limited clean-up resources. The CAB agrees with the long range goals of the groundwater remediation program to protect human health and the environment by:

- Containing and mitigating off-site groundwater contamination as in the TCE contamination in the NW plume
- Attacking the source of contamination as in the C-400 project

The January 17th progress report on the C-400 Phase IIb remediation project was of great concern to the CAB. At that Groundwater Subcommittee meeting, the CAB learned that the Draft 2 Proposed Plan that was to be submitted in early February would not be in agreement with the regulators that must approve the plan. In simple terms, the D2 Proposed Plan recommended chemical oxidation as the treatment technology. The regulators, on the other hand, felt that steam enhanced extraction (SEE) was the better technology approach. Both sides had their experts and groundwater models primed to prove their case.

DOE and regulators have agreed to a one year pilot study to test the suitability of SEE for the C-400 Phase IIb remediation project. "Technical Gridlock" has been avoided and technical progress was being made on this project. While the CAB understands that this could delay ultimate treatment of the problem, which is something we were hoping to avoid, we do understand that it may be in the best interest of the taxpayers to do a small scale pilot project for approximately \$1,000,000 before investing \$22,000,000 in a technology that hasn't been proven to work under our site conditions.

Recommendation

If the CAB is going to fully support the proposed pilot study of steam enhanced extraction for the C-400 Phase IIb remediation project, there is some information that we would like to have clearly defined before the project begins so that we can clearly understand what defines success and failure for this project

1. The CAB would like to see the Data Quality Objectives that are developed for this project. We would also like to see the criteria specified to define success or failure of the project in clearly defined and easily understood terms.
2. While we understand that DOE is reluctant to set a high end cost limit at which the technology would be deemed too expensive for full scale deployment, the CAB would like to see a cost to benefit matrix at the end of the study so that we clearly understand DOE's position on this technology, with feedback from the regulators.
3. Some believe this treatment will work for the C-400 source area for TCE, but we would still like to see some clearly defined steps for moving forward in parallel in case this technology doesn't deliver the expected results. The CAB does not want to sit in a holding pattern for several more years while other technologies are explored.

With the pending termination of uranium enrichment processing at the PGDP site, economic development leaders in the community are actively searching for new industries to reindustrialize the site. It is very important to the community and potential industries that DOE have clearly defined metrics to evaluate if this

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project is successful, and a clear plan with backup treatment alternatives developed if this project is not successful. The CAB requests quarterly updates on the progress of the project. Time is of the essence when it comes to cleaning up this site, as the economic stability of Paducah is depending on reindustrialization at the site. We cannot afford to continue pushing treatment down the road.